

## **Exhibit A**

to

**UNITED STATES TRUSTEE’S OBJECTION TO  
THE DEBTORS’ MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS (I)  
AUTHORIZING THE DEBTORS TO (A) FILE A CONSOLIDATED LIST OF THE  
DEBTORS’ THIRTY LARGEST UNSECURED CREDITORS, (B) FILE A  
CONSOLIDATED LIST OF CREDITORS IN LIEU OF SUBMITTING A SEPARATE  
MAILING MATRIX FOR EACH DEBTOR, (C) REDACT OR WITHHOLD CERTAIN  
CONFIDENTIAL INFORMATION OF CUSTOMERS, AND (D) REDACT CERTAIN  
PERSONNALLY IDENTIFIABLE INFORMATION; (II) WAIVING THE  
REQUIREMENT TO FILE A LIST OF EQUITY HOLDERS AND PROVIDE NOTICES  
DIRECTLY TO EQUITY SECURITY HOLDERS AND PROVIDE NOTICES DIRECTLY  
TO EQUITY SECUIRYT HOLDERS; AND  
(III) GRANTING RELATED RELIEF**

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# WEWORK GLOBAL PRIVACY POLICY

Last Updated: May 24, 2023

## INTRODUCTION

WeWork respects your privacy and is committed to maintaining your trust by protecting your personal data. This Global Privacy Policy (“**Policy**”) describes how WeWork collects, uses, shares or otherwise processes data that (either in isolation or in combination with other information) enables you to be directly or indirectly identified (“**Personal Data**”) and explains the rights you may have in relation to your Personal Data.

This Policy is intended to help you understand how WeWork processes your Personal Data when you:

- interact with us on our websites that display or link to this Policy;
- use our products and services, including our software and technology platform and applications made available for use online or through mobile devices, where we act as a controller of your Personal Data;
- act as a service provider, supplier or vendor to WeWork;
- register for, attend or take part in our events, webinars, programs, promotions or contests;
- receive communications from us or otherwise communicate with us;

Feedback

- subscribe to receive our newsletters, updates or other communications;
- participate in surveys, research or other similar data collection activities facilitated by WeWork;
- are employed by or affiliated with an organization or institution that uses our products and services where your Personal Data has been shared with us in our capacity as a controller (e.g., to authorize your access to your employer, educational institution or an another organization's account); or
- access our locations as a member, service provider or an attendee to an event hosted or co-hosted by WeWork.

This Policy does not apply to the extent we process Personal Data in the role of a processor or service provider on behalf of our customers, including in connection with the WeWork Workplace Platform. For more information regarding our processing activities in connection with the WeWork Workplace Platform, please see Section 16.4 - *WeWork Workplace Customer Data Used in Connection with the WeWork Workplace Platform* below.

## 2. WHO WE ARE

WeWork Companies LLC and/or its affiliated entities are responsible for the processing of your Personal Data as described in this Policy, and, unless otherwise specified, act as the controller of such Personal Data. That means that WeWork determines "why" and "how" your Personal Data is collected and used. The WeWork entity that controls your Personal Data may differ depending on where you reside and/or where you interact with us. A list of the WeWork entities that may act as the controller in your jurisdiction can be found [here](#).

A reference to "**WeWork**", "**we**", "**our**" or "**us**" is a reference to the relevant WeWork entity that is the controller of your Personal Data.

*NOTE: Certain WeWork locations may be owned and/or operated by a third-party ("**Licensee**") under a license or similar agreement with WeWork. WeWork acts as an independent controller in relation to our Licensees and we are not responsible for the privacy or data security practices of our Licensees, which may differ from those*

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*explained in this Policy. A list of Licensees that own and/or operate a WeWork location can be found [here](#).*

### 3. PERSONAL DATA WE COLLECT

As a global provider of flexible workspace solutions, we collect different types of Personal Data about you based on how you interact with us and the products and services you access and use. The different types of Personal Data we may collect are categorized in the table below. Please note, however, that not all categories may be applicable to you.

CATEGORY	DESCRIPTION OF INFORMATION
<b>Contact Information</b>	Data such as your name, email address, physical address, phone number, date of birth, employer or educational institution name and your title or role (as that information relates to your use of our products and services) and other contact information.
<b>Supplemental Identification (ID) Information</b>	Data such as your government-issued identity document, photo and other information collected for identity, age verification and fraud prevention purposes.
<b>Account Information</b>	Data associated with your WeWork account, such as username, password, profile picture and designated WeWork “home” location.
<b>Payment Information</b>	Data about your billing address and method of payment such as bank details, credit, debit or other payment card information.
<b>Activity &amp; Usage Information</b>	Data associated with your activity and use of our products and services, including <b>Membership Activity &amp; Usage Information</b> : data associated with your membership activity and use of our workspaces such as keycard and/or mobile key access data (i.e. date and time of arrival or scan at access point), desk, office and room booking data, printer usage data, credit usage data, desk location data and other information relating to your membership activity and use of our workspaces and membership products and services.
<b>Security Information</b>	Data such as your image and video footage captured by closed circuit television (CCTV), your access data logs, data collected about you in connection with

	security incidents that involve you and other information relating to the safety and security of our locations.
<b>Vehicle Information</b>	Data associated with your vehicle to enable you to park at our locations, such as your vehicle registration and license plate numbers.
<b>Event Information</b>	Data collected for purposes of registration and participation in events and webinars, such as attendee badge information (e.g., name, title and company name and image), email address, photographs and videos captured during events.
<b>Device, Internet &amp; Network Activity Information</b>	Data from which your device could be identified, such as device ID or other unique identifiers, or about your device, such as browser type, your geolocation information (taken through your mobile device's GPS signal, browser's WIFI signal or Bluetooth technology, if your device settings allow for this), IP address, MAC address, data and other information relating to your device and activity on and use of our websites, mobile applications, emails and online content, to the extent such data is considered Personal Data under applicable data protection laws.
<b>Third-Party Membership or Loyalty Program Data</b>	Data associated with your third-party memberships or loyalty programs, such as airline and hotel affiliations and other similar information collected to enable points to be allocated to your associated rewards programs.
<b>Other Voluntary Personal Data</b>	Data such as the content of your communications with us, including interactions with customer support and our social media channels, participation in surveys, questionnaires, contests or other promotional offers, data you provide when you sign up to receive news, promotions or other marketing communications from us or our partners and any other information you voluntarily provide to us.

In limited circumstances, we may also collect the following categories of Personal Data:

CATEGORY	DESCRIPTION OF INFORMATION
<b>Electronic Identity Information (eIDV)</b>	Data collected for the purpose of verifying your identity using specific criteria from public and private data sets. In certain jurisdictions where permitted, this may include biometric data generated from photos you provide. This data is collected for the limited purpose of identity verification and/or compliance with anti-money laundering and criminal financing legislation (as further described in Section 5 [ <i>Purposes for Which We Process Your Personal Data and the Legal Bases on Which We Rely</i> ] below).

<b>Medical &amp; Health Information</b>	Data collected in connection with incidents or medical emergencies involving you at our locations.
<b>Other Sensitive Personal Data</b>	Data collected with your consent and used as necessary to perform reasonably expected services or as required by law. Unless specifically requested, we ask that you not provide any Sensitive Personal Information.

## 4. HOW WE COLLECT YOUR PERSONAL DATA

### 4.1 Directly from You

We collect most of your Personal Data directly from you. The categories of Personal Data that we collect depends on how you interact with us. For example, you may provide us Personal Data when you sign-up or activate a WeWork membership, contact us or inquire about our products or services, access our locations, use our mobile applications, participate in surveys, interact with our websites, attend or take part in events or webinars or provide services to us. You may not always be required to provide Personal Data that we request. If you do not wish to provide your Personal Data to us, you may choose not to do so or opt-out of our processing of your Personal Data when this option is offered to you. However, you should be aware that if you do not provide Personal Data that we request, we may not be able to provide you with our products or services or respond to your requests for which the provision of such Personal Data is necessary.

### 4.2 From Automated Means, Devices and Our Network

We may automatically collect your Personal Data, which we may observe or detect without directly asking you to provide the information to us. As is common practice among businesses that operate online and through technology, this will mainly include information gathered automatically through your activity on and use of our websites, mobile applications, emails and online content. This information includes Device, Internet and Network Activity Information and other information collected through cookies, web beacons and other similar technologies. For more information on how we

use cookies, internet advertising and other tracking technologies, please see our [Cookie Policy](#).

### 4.3 From Other Sources

We may also collect your Personal Data from other sources as described in the table below.

SOURCE	SITUATION (EXAMPLES)
<b>WeWork Group Companies</b>	As a normal part of conducting business and to enable your use of our products and services, for instance, if you access and use multiple products and services, such as use of the WeWork Workplace Platform to access WeWork membership services.
<b>Your Employer, Educational Institution or Other Organization</b>	To invite you to activate your membership or account and to authorize your access to your employer's, educational institution's or other organization's, as applicable, account for contracted products and services, if your membership or account is associated with your employer, educational institution or another organization's contract for our products and services.
<b>Licensees</b>	To enable your use of our products and services in certain locations owned and/or operated by License as described in this Policy.
<b>Authentication Partners</b>	To authenticate and administer access to your WeWork account using third-party authorization procedures (e.g., single sign-on (SSO) providers)
<b>Your Friends, Family Members or Close Acquaintances</b>	To refer you to use our products and services.
<b>Third-Party Space Booking Platform Providers</b>	To facilitate bookings at WeWork locations that you reserve through third-party space booking platforms.
<b>Real Estate Brokers</b>	To facilitate transactions with you for our products and services.
<b>Our Agents, Consultants, Partners and Service</b>	To assist with the provision and promotion of our products and services and performance of business-related functions (e.g., payment partners and

<b>Providers</b>	merchants, advertising and marketing partners).
<b>Our Landlords and Building Owners and Managers</b>	To facilitate access and security at buildings where we have workspaces.
<b>Event Sponsors</b>	To manage registration and participation in events hosted at our locations.
<b>Data Brokers and Publicly-Available Sources</b>	To help us correct or supplement our records for marketing campaigns, offers and online advertising efforts or to assist with sales activities.
<b>Other Third Parties Acting at Your Direction</b>	To facilitate your use of our products and services.

## 5. PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA AND THE LEGAL BASIS ON WHICH WE RELY

We are committed to the lawful processing of your Personal Data in accordance with data protection laws, which in certain jurisdictions require us to have a valid legal basis to do so. In most circumstances, we rely on our legitimate interests or those of third parties (where they are not overridden by your interests or fundamental rights and freedoms), for the performance of a contract with you or to comply with our legal obligations. In certain circumstances, we may process your Personal Data to protect your vital interests or those of other persons or to further an important public interest or we may rely on your consent, which may be implied (e.g., where you have volunteered information for use by us) or express (in accordance with applicable law). Where we rely on your consent as a legal basis, you may withdraw your consent at any time for any processing activities that we conduct based solely on your consent. Please see Section 11 [*Your Rights Relating to Your Personal Data*] below to learn more about your rights, including your right to withdraw consent.

To make it easier to understand the purposes for which we use your Personal Data and, where required, the legal basis on which we rely, we have organized this information into categories in the sections and tables below. For more information on the legal bases on which we rely to process your Personal Data, please contact us using the details provided in Section 14 [*Contacting Us*] below.



5.1 WeWork Membership Products and Services

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
To register and activate your membership account and, where applicable, to authorize access to your employer, educational institution or another organization’s account	<ul style="list-style-type: none"> <li>◦ Contact Information</li> <li>◦ Account Information</li> </ul>	<ul style="list-style-type: none"> <li>◦ To perform a <b>contract</b> with you, if you contract for your own membership products and services</li> <li>◦ Our <b>legitimate interests</b>, namely activating your account to enable access to our products and services in connection with your employment, education or other relationship with the organization, if your membership account is associated with your employer, educational institution or another organization’s contract for membership products and services</li> </ul>
To determine your eligibility for age-restricted products (e.g., alcohol, beer and wine)	<ul style="list-style-type: none"> <li>◦ Contact Information</li> <li>◦ Supplemental ID Information</li> </ul>	<ul style="list-style-type: none"> <li>◦ <b>Compliance with a legal obligation</b> with respect to providing age-restricted products</li> </ul>
To activate your keycard or mobile key (to the extent available) to enable your physical access to our locations and/or Licensees’ locations	<ul style="list-style-type: none"> <li>◦ Contact Information</li> <li>◦ Account Information</li> <li>◦ Supplemental ID Information</li> </ul>	<ul style="list-style-type: none"> <li>◦ To perform a <b>contract</b> with you, if you contract for your own membership products and services</li> </ul>

		<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely performing a contract we have with your employer, educational institution or other organization, as applicable, and enabling access to workspaces in connection with your employment, education or other relationship with the organization, if your membership account is associated with your employer, educational institution or another organization's contract for membership products and services</li> </ul>
<p>To provide our membership products and services (e.g., access to WeWork's offices, rooms and/or workspaces, access to the WeWork member network, access to the shared Internet connection, use of printers and opportunities to participate in members-only benefits and promotions)</p>	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> <li>○ Membership Activity &amp; Usage Information</li> <li>○ Other Voluntary Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>○ To perform a <b>contract</b> with you, if you contract for your own membership products and services</li> <li>○ Our <b>legitimate interests</b>, namely performing a contract we have with your employer, educational institution or other organization, as applicable, and enabling access to workspaces in connection with your employment, education or other relationship with the organization, if your membership account is associated with your employer, educational institution or another organization's contract for membership products and services</li> </ul>
<p>To enable and facilitate your parking at our locations, where applicable</p>	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> <li>○ Vehicle Information</li> </ul>	<ul style="list-style-type: none"> <li>○ To perform a <b>contract</b> with you, if you contract for your own membership products and services</li> </ul>

		<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely enabling access to parking at our locations in connection with your employment, education or other other relationship with the organization, if your parking access is associated with your employer, educational institution or another organization’s contract for parking services</li> </ul>
To facilitate, monitor and manage your access to our locations (e.g., date and time of arrival associated with your keycard or mobile key)	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Account Information</li> <li>Security Information</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely ensuring the safety and security of our offices, employees, members and guests and performing a contract with our landlords, building owners and managers that require us to collect and provide such data to facilitate access and security at the base building controls where our offices and workspaces are located</li> </ul>
To monitor, manage and report on your membership activity and use of our membership products and services (e.g., to account for access , reservations and bookings, printer usage and other credit usage and capacity management)	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Account Information</li> <li>Membership Activity &amp; Usage Information</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely assessing how you use our products and services in order to customize and improve our products and services, enable accurate reporting and to ensure compliance with applicable terms and conditions</li> </ul> <p><i>In circumstances where we share your Membership Activity and Usage Information with your employer, educational institution or another organization (to the extent your membership account is associated with such organization):</i></p>

		<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely demonstrating the effectiveness of our products and services and/or compliance with applicable terms and conditions</li> <li>○ Your employer, educational institution or other company's <b>legitimate interests</b>, namely assessing the effectiveness of its membership models and plans (e.g., utilization, forecasting, revenue, capacity planning and real estate strategy)</li> </ul>
To facilitate opportunities to participate in members-only benefits and promotions provided by select third-party partners (including to share your Personal Data with select partners so that they can contact you with information regarding their products and services related to your membership)	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely offering you access to similar goods and services that enhance your membership</li> <li>○ <b>Consent</b>, if required under applicable law</li> </ul>

## 5.2 WeWork Workplace Platform

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
To register and activate your user account and to authorize your access to a WeWork Workplace Platform controlled by a customer	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely activating your account to enable access to our products and services in connection with your employment or other relationship with our customer</li> </ul>

To perform administrative functions (e.g., account management, invoicing and support)	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> <li>○ Activity &amp; Usage Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely facilitating the effective provision and administration of our products and services</li> </ul>
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*NOTE: In connection with the WeWork Workplace Platform, WeWork processes Personal Data as a processor or service provider on behalf of our customer and in accordance with our customer’s instructions, including any applicable terms in the agreement with that customer. For more information regarding our processing activities in connection with the WeWork Workplace Platform, please see Section 16.4 - “WeWork Workplace Customer Data Used in Connection with the WeWork Workplace Platform” below.*

### 5.3 Other WeWork Products and Services

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
To provide our products and services, which may include, without limitation, a professional address with mail and package handling services and indoor and outdoor event spaces	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> <li>○ Activity &amp; Usage Information</li> <li>○ Other Voluntary Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>○ To perform a <b>contract</b> with you, if you contract for your own membership products and services</li> <li>○ Our <b>legitimate interests</b>, namely performing a contract we have with an organization and providing our products and services in connection with your relationship with such organization, if your account is associated with another organization’s contract for services</li> </ul>

To monitor, manage and report on your use of our products and services	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Account Information</li> <li>Activity &amp; Usage Information</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely assessing how you use our products and services in order to customize and improve our products and services, enable accurate reporting and to ensure compliance with applicable terms and conditions</li> </ul>
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5.4 Communications

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
To send you transactional communications (e.g., service messages, invoices, receipts, registration emails, security alerts, updated terms and policy changes, booking confirmations and other non-marketing communications)	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Account Information</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely administering our business efficiently and effectively</li> </ul>
To develop and send you marketing, sales, promotional and other non-transactional communications about our, and our Licensees’ and partners’ products and services (e.g., newsletters, telemarketing calls, promotions, news, SMS or push notifications and event invites)	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Account Information</li> <li>Event Information</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely promoting our (and our partners’) products, services and events that we believe may be of interest to you or where you have provided your <u>consent</u> (if required under applicable law, and in certain circumstances, may be implied)</li> </ul> <p><i>Please see Section 11 [Your Rights Relating to Your Personal Data] below to learn how you can control WeWork’s processing of your Personal Data for marketing purposes</i></p>

To record phone or video calls (in accordance with law) or retain transcripts of dialogue for training, quality assurance and administration purposes	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Other Voluntary Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely maintaining the quality of our calls with current and prospective members and customers</li> <li><b>Consent</b>, if required under applicable law</li> </ul>
To respond to comments or questions or to provide information you request, such as when you contact us by email, phone, chat, in-app support or web forms (e.g., “Contact Us”)	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Other Voluntary Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely fulfilling your requests and communicating with you</li> </ul>

### 5.5 Third-Party Add-Ons, Integrations and Services and Loyalty Programs

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
To fulfill your request to access third-party products and services, add-ons, features and functionality in connection with your membership (e.g., IT support, insurance and technology services)	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Account Information</li> </ul>	<ul style="list-style-type: none"> <li>To perform a <b>contract</b> with you, if you contract for your own membership products and services</li> <li>Our <b>legitimate interests</b>, namely performing a contract we have with your employer, educational institution or other organization, if your membership account is associated with your employer, educational institution or another organization’s contract for membership products and services</li> </ul>

		<ul style="list-style-type: none"> <li>○ Your employer, educational institution or other organization’s <b>legitimate interests</b>, namely in providing you with additional services that enhance your membership</li> </ul>
To fulfill your, or your employer, educational institution or another organization’s request, as applicable, to book and reserve third-party office space via WeWork’s software and technology platform and applications	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> </ul>	<ul style="list-style-type: none"> <li>○ To perform a <b>contract</b> with you, if you contract for your own membership products and services</li> <li>○ Our <b>legitimate interests</b>, namely performing a contract we have with your employer, educational institution or other organization, if your membership account is associated with your employer, educational institution or another organization’s contract for membership products and services</li> <li>○ Your employer, educational institution or other organization’s <b>legitimate interests</b>, namely in providing you with a convenient way to book and reserve third-party office spaces using a single platform and/or application</li> </ul>
To enable points to be allocated to your third-party memberships or loyalty rewards programs (e.g., airline and hotel affiliations)	<ul style="list-style-type: none"> <li>○ Third-Party Membership or Loyalty Program Data</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely providing you with incentives and rewards for using our products and services</li> </ul>

5.6 Events and Webinars

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
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To manage attendance for events that we organize, host and/or co-host at our locations	<ul style="list-style-type: none"> <li>Event Information</li> </ul>	<ul style="list-style-type: none"> <li><b>Compliance with a legal obligation</b> with respect to health and safety (e.g., fire safety codes)</li> </ul>
To manage registrations and participation in events and webinars that we organize, host and/or co-host (including to send you related communications, and where applicable, to send your registration information to third-party organizers and co-sponsors)	Event Information	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely planning and hosting (or co-planning and co-hosting, as applicable) events and webinars for which you have registered or that you attend</li> </ul>
To photograph and record events and webinars	<ul style="list-style-type: none"> <li>Event Information</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely developing event and webinar-related content and promotional materials and providing the ability for you to rewatch event and webinar-related content</li> <li><b>Consent</b>, in circumstances where a publicity waiver and release is executed by you in connection with an event</li> </ul>

### 5.7 Websites and Social Media Pages

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
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To operate and administer our websites (including our social media pages) and to provide you with the content you access and request	<ul style="list-style-type: none"> <li>◦ Device, Internet &amp; Network Activity Information</li> </ul>	<ul style="list-style-type: none"> <li>◦ Our <b>legitimate interests</b>, namely providing online content to our customers and prospective customers regarding our service offering and related information</li> </ul>
To analyze website usage patterns and to help us optimize the relevance and performance of our website and the user experience on our websites	<ul style="list-style-type: none"> <li>◦ Device, Internet &amp; Network Activity Information</li> </ul>	<ul style="list-style-type: none"> <li>◦ Our <b>legitimate interests</b>, namely providing a relevant and well-functioning website for the benefit of our website visitors</li> </ul>
To conduct market research, advertise to you, provide personalized information about us on and off our websites and to provide other personalized content based upon your activities and interests	<ul style="list-style-type: none"> <li>◦ Device, Internet &amp; Network Activity Information</li> </ul>	<ul style="list-style-type: none"> <li>◦ Our <b>legitimate interests</b>, namely advertising our products and services</li> <li>◦ <b>Consent</b>, if required under applicable law</li> </ul>
To track use of our websites and to verify accounts and activity as part of our efforts to keep our website secure	<ul style="list-style-type: none"> <li>◦ Device, Internet &amp; Network Activity Information</li> </ul>	<ul style="list-style-type: none"> <li>◦ Our <b>legitimate interests</b>, namely protecting against misuse or abuse of our websites, promoting the safety and security of our websites and protecting our rights and the rights of others</li> </ul>
To facilitate your requests for additional information or marketing communications such as when you check a box or fill out a web forms (e.g., "Contact Us")	<ul style="list-style-type: none"> <li>◦ Contact Information</li> <li>◦ Other Voluntary Personal Data</li> <li>◦ Device, Internet &amp; Network Activity Information</li> </ul>	<ul style="list-style-type: none"> <li>◦ Our <b>legitimate interests</b>, namely promoting our (and our partners') products, services and events that we believe may be of interest to you</li> <li>◦ <b>Consent</b>, if required under applicable law</li> </ul>

## 5.8 Service Provider, Supplier and Vendor Management

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
To activate your keycard or mobile key (to the extent available) to enable your physical access to our locations and/or Licensees' locations if you provide on-site services	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> <li>○ Supplemental ID Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely enabling access to our locations to provide services at our locations</li> </ul>
To monitor, facilitate and manage your access to our workspaces and buildings (e.g., date and time of arrival associated with your keycard or mobile key) if you provide on-site services	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> <li>○ Security Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely ensuring the safety and security of our offices, employees, members and guests and performing a contract with our landlords, building owners and managers that require us to collect and provide such data to facilitate access and security at the base building controls where our workspaces are located</li> </ul>
To monitor, manage and report on your service activity (including to share your service activity information with your employer or contractor to the extent you are employed or contracted with our vendor)	<ul style="list-style-type: none"> <li>○ Contact Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely managing our business operations and assessing the services being provided and compliance with the terms and conditions of our service contracts</li> </ul>

## 5.9 Other Data Processing Activities

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
To verify your identity for fraud prevention and/or compliance with anti-money laundering and criminal financing legislation, anti-corruption and anti-bribery regulations	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Supplemental Identification Information</li> <li>○ Electronic Identity Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely preventing fraud and unauthorized use of our products and services, if for fraud prevention</li> <li>○ <b>Compliance with a legal obligation</b> with respect to anti-money laundering and criminal financing legislation and anti-corruption and anti-bribery regulations</li> <li>○ <b>Consent</b> (or explicit consent) where we use biometric data to verify your identity, if required by applicable law</li> </ul>
To manage payments as necessary to complete a transaction (including service retainers)	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Payment Information</li> </ul>	<ul style="list-style-type: none"> <li>○ To perform a <b>contract</b> with you, if you contract for your own products and services</li> <li>○ Our <b>legitimate interests</b>, namely invoicing for our products and services and the management of our customer accounts, if your account or use of our products or services is associated with your employer, educational institution or an another organization's contract for our products and services</li> </ul>

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To create internal reports and models (e.g., utilization, forecasting, revenue, financial, capacity planning and management, product and services strategy)	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> <li>○ Payment Information</li> <li>○ Activity &amp; Usage Information</li> <li>○ Vehicle Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely managing our business operations, improving our products and services and meeting our obligations associated with the reporting of our finances</li> </ul>
To optimize the performance and functionality of our products and services	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> <li>○ Activity &amp; Usage Information</li> <li>○ Device, Internet &amp; Network Activity Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely ensuring that our products and services perform in line with customer expectations and offering innovative products and services that meet our customer's evolving business needs</li> </ul>
To measure occupancy levels at our locations	<ul style="list-style-type: none"> <li>○ Activity &amp; Usage Information</li> <li>○ Security Information</li> </ul>	<ul style="list-style-type: none"> <li>○ <b>Compliance with a legal obligation</b> with respect to health and safety (e.g., fire safety codes)</li> </ul>
To determine your geographic location to improve special offers and enable location-based services	<ul style="list-style-type: none"> <li>○ Contact Information</li> <li>○ Account Information</li> <li>○ Device, Internet &amp; Network Activity Information</li> </ul>	<ul style="list-style-type: none"> <li>○ Our <b>legitimate interests</b>, namely enhancing and personalizing our products and services based on your location</li> <li>○ <b>Consent</b>, if required under applicable law</li> </ul>

To monitor our locations using CCTV	<ul style="list-style-type: none"> <li>Security Information</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely ensuring the safety and security of our offices, employees, members and guests; investigating, detecting and preventing suspicious activity and crime at our locations; and protecting our rights and the rights of others</li> </ul>
To research and innovate (including to send customer experience surveys and market research surveys on topics related to our products and services or conduct interviews)	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Account Information</li> <li>Other Voluntary Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely improving and iterating our products and services through information obtained from surveys and interviews</li> <li><b>Consent</b>, on a voluntary basis, except where required by applicable law</li> </ul>
To administer promotions and contests	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Account Information</li> <li>Other Voluntary Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely providing opportunities to participate in promotions and contests that may be of interest to you</li> <li><b>Compliance with a legal obligation</b> with respect to compliance with rules and regulations relating to sweepstakes</li> </ul>
To anonymize your Personal Data so that it is no longer identifying	<ul style="list-style-type: none"> <li>Any of the Categories of Personal Data listed in Section 3</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely minimizing the amount of Personal Data processed as part of the applicable processing activity</li> </ul>

<p>To comply with our responsibilities under data protection laws relating to your processing of Personal Data (e.g., to respond to and maintain records relating to data subject rights requests, to cooperate with supervisory authorities, to respond to inquiries and complaints and to maintain records of consent and suppression lists)</p>	<ul style="list-style-type: none"> <li>Any of the Categories of Personal Data listed in Section 3</li> </ul>	<ul style="list-style-type: none"> <li><b>Compliance with a legal obligation</b> with respect to applicable data protection laws</li> </ul>
<p>To respond to claims and complaints</p>	<ul style="list-style-type: none"> <li>Any of the Categories of Personal Data listed in Section 3</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely defending any actual or potential legal claims, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes and handling complaints</li> </ul>
<p>To comply with public and government authorities, courts, law enforcement and regulators lawful requests, notices and orders (to the extent this requires us to process or disclose your Personal Data)</p>	<ul style="list-style-type: none"> <li>Any of the Categories of Personal Data listed in Section 3</li> </ul>	<ul style="list-style-type: none"> <li><b>Compliance with a legal obligation</b> with respect to responding to lawful requests, notices, proceedings, orders or legal processes</li> </ul>
<p>To ensure the health and safety of our employees, members and guests (including to monitor and reduce the spread of Covid-19)</p>	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Security Information</li> <li>Medical &amp; Health Information</li> </ul>	<ul style="list-style-type: none"> <li><b>Compliance with a legal obligation</b> with respect to health and safety</li> </ul> <p>To further an important <b>public interest</b> in the area of public health</p>

		<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely ensuring the health of our employees, members and guests</li> </ul> <p><i>For information regarding our legal basis for processing your Personal Data in connection with our response to the COVID-19 pandemic, please see our <a href="#">COVID-19 Privacy Notice</a></i></p>
To respond to, handle and document incidents and medical and other emergencies occurring at our locations (including requests for medical assistance or emergency services, as applicable)	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Security Information</li> <li>Medical &amp; Health Information</li> </ul>	<ul style="list-style-type: none"> <li><b>Compliance with a legal obligation</b> with respect to documenting on-site incidents</li> <li>Our <b>legitimate interests</b>, namely protecting our legal rights, safety and operations</li> <li>To protect your <b>vital interests</b> or those of other persons in circumstances where we contact medical or emergency services</li> </ul>
To enable us to reorganize, restructure, sell or license our business or our assets	<ul style="list-style-type: none"> <li>Any of the Categories of Personal Data listed in Section 3</li> </ul>	<ul style="list-style-type: none"> <li>Our <b>legitimate interests</b>, namely administering our business efficiently and effectively</li> </ul>

## 6. HOW WE SHARE YOUR PERSONAL DATA

We consider the protection of your Personal Data to be a vital part of our relationship with you; therefore, we do not sell your Personal Data to third parties. There are, however, certain circumstances in which we may disclose, transfer or share your Personal Data with certain third parties (“**Third Parties**”) as set forth in this Policy. These Third Parties can be categorized as follows:



- **WeWork Group Companies.** We may share your Personal Data with our parent companies, subsidiaries and/or affiliates (“**WeWork Group Companies**”) for purposes consistent with this Policy. WeWork Group Companies shall process your Personal Data in accordance with this Policy.
- **Licensees.** Certain WeWork locations may be owned and/or operated by Licensees under a license or similar agreement with WeWork. Accordingly, we may share your Personal Data with such Licensees for purposes consistent with this Policy. WeWork acts as an independent controller in relation to our Licensees and we are not responsible for the privacy or data security practices of our Licensees, which may differ from those explained in this Policy.
- **Our Service Providers.** We use third-party companies, vendors, agents and contractors (“**Service Providers**”) to perform services or business-related functions on our behalf or to assist us with the provision of our products and services. We may share your Personal Data with such Service Providers as necessary for them to perform or provide services on our behalf. For example, we engage Service Providers to provide data hosting, payment processing, marketing, online advertising, communications, infrastructure and IT services, research and analytics, customer service, surveys, data enhancement, fraud prevention (including anti-money laundering (AML) checks), website analytics, CRM services, network and information security and technical support. Service Providers are contractually bound to implement appropriate security measures to protect the Personal Data in their possession and to process the Personal Data consistent with this Policy. Service Providers are not authorized to use or disclose your Personal Data for their own purposes and are contractually bound to process Personal Data only as necessary to perform or provide services on our behalf and in accordance with our documented instructions.
- **Advertising Partners.** As is common practice among companies that operate online, we may share limited Personal Data with certain third parties, including non-affiliated business partners, advertising networks, analytics providers and other advertising providers (“**Advertising Partners**”) for purposes of targeting advertisements on non-WeWork websites, applications and services. In addition, we may allow certain Advertising Partners to collect limited information from our websites and services using cookies, web beacons, mobile advertising identifiers

and other technologies. These Advertising Partners may use this information to display online advertisements tailored to your interests and preferences across your browsers and devices and to conduct ad campaign measurement and website analytics. We do not control the types of information collected and stored by these third-party cookies, web beacons, mobile advertising identifiers and other technologies. You should refer to the third-party's website for more information on how they use cookies.

- **Our Professional Advisors.** We may share your Personal Data with our professional advisors, including our lawyers, bankers, auditors and insurers who provide consultancy, legal, banking, auditing, insurance and accounting services to us. Our professional advisors are subject to appropriate obligations of confidentiality (whether contractual or statutory) with respect to Personal Data.
- **The Member Company or Account Holder with Whom You are Associated.** We may share your Personal Data with your employer, educational institution or another organization (to the extent your account or use of our products or services is associated with such party's contract for our products and services) ("**Member Company**" or "**Account Holder**," as applicable) for purposes consistent with this Policy. For example, membership activity and usage data may be shared to enforce our terms and policies (including payment obligations) and to allow for Member Company or Account Holder to assess the effectiveness of our models and plans and to perform administrative functions such as utilization, forecasting, capacity planning and real estate strategy.
- **Add-On and Integration Partners.** Through our software and technology platform and applications or in connection with our products and services, we may provide you with opportunities to integrate with and/or access additional features, functionality, applications, products and/or services (collectively, "**Add-Ons**") provided by non-affiliated third parties ("**Add-On Partners**"). Some Add-On Partners may need to access or collect your Personal Data in order to provide the Add-Ons. In circumstances where you integrate with or choose to access or use Add-Ons, we may share your Personal Data with the associated Add-On Partner so that you can access or use the Add-On. For example, we may share your Personal Data with a third-party office space provider to facilitate your third-party office space booking made through our software and technology platform and

applications. We do not control the Add-On Partners' use of your Personal Data and their use of your Personal Data will be subject to their own terms and policies. We are not responsible for the privacy or data security practices of the Add-On Partners, which may differ from those explained in this Policy. You should refer to the applicable Add-On Partner's privacy policy and direct any privacy or data security questions directly to them. If you do not want your Personal Data to be shared with an Add-On Partner, you should not use an Add-On.

- **Organizers, Hosts and Sponsors.** We may share your Personal Data with organizers, hosts and sponsors ("**Sponsors**") when you register for, attend or take part in events, webinars, programs, promotions or contests associated with such Sponsors. For example, if you input your name and email address into a web form for an event, webinar, program, promotion or contest, the associated Sponsor will receive that information. Sponsors that receive your information may send you communications, which may be subject to their own privacy policy. We are not responsible for the privacy or data security practices of such Sponsors, which may differ from those explained in this Policy. You should refer to the Sponsor's privacy policy and direct any privacy or data security questions directly to them.
- **Our Landlords and Building Owners and Managers.** We may share your Personal Data with our landlords and building owners and managers as necessary to comply with our lease and/or management agreements that require us to collect and provide such data to facilitate access and security at the base building controls where our workspaces are located. For example, we may be required to share your Personal Data in order to enable your WeWork keycard or mobile key to function at base building access controls. Our landlords and building owners and managers are subject to standard confidentiality arrangements.
- **Membership and Loyalty Program Partners.** We may partner with third-party program partners ("**Program Partners**") such as airline and hotel companies to provide you with opportunities to earn loyalty program points in connection with certain WeWork purchases. If you participate in these opportunities, we may share your Personal Data with those Program Partners in order to properly attribute points to your associated rewards program. Personal Data shared in these circumstances will be subject to the Program Partner's own terms of service and privacy policy. We are not responsible for the privacy or data security practices of

such Program Partners, which may differ from those explained in this Policy. You should refer to the Program Partner's privacy policy and direct any privacy or data security questions directly to them.

- **Our Partners (in Connection with your Membership).** Where permitted by law, we may share your Personal Data with select partners that offer products and services related to your membership. For example, we may share your basic Contact Information with specific insurance providers who may contact you to provide products and services to meet your contractual insurance requirements. Where required by applicable law, we will only share your Personal Data with your consent. Our partners are bound by a contractual obligation to process Personal Data only as necessary to offer products and services related to your membership.
- **Third Parties Involved In Business Transactions.** If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of our assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities, your Personal Data may be shared or transferred, subject to standard confidentiality arrangements.
- **Other Third-Party Disclosures.** We may share your Personal Data: (i) at your direction or with your consent, (ii) if required to do so by law in order to, for example, respond to a subpoena or request from law enforcement, a court or a government agency (including in response to public authorities to meet national security or law enforcement requirements) or (iii) in the good faith belief that such action is necessary to: (a) comply with a legal obligation, (b) protect or defend our rights, interests or property or that of our employees, agents, members, customers and other third parties, (c) prevent or investigate possible wrongdoing in connection with our products and services, (d) enforce our terms and conditions, policies and agreements, (e) act in urgent circumstances to protect the personal safety of you, other individuals or the public or (f) protect against legal liability.

## 7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

WeWork's products and services are available around the world. To make that possible, your Personal Data may be transferred to, accessed by and stored by us and Third

Parties in the United States and other countries, which may include jurisdictions outside your own. These jurisdictions may have data protection laws that differ from the laws where you reside, and in some cases, may not be as comprehensive or protective. Although the data protection laws of certain jurisdictions may differ from those where you reside, we take appropriate steps, such as implementing standard contractual clauses, relying on adequacy decisions and other international transfer agreements or frameworks approved by regulators and governments, to ensure your Personal Data is handled as described in this Policy and in accordance with applicable data protection law.

## 8. RETENTION OF PERSONAL DATA

We retain Personal Data for a period of time consistent with the original purpose of collection (see Section 5 [*Purposes for Which We Process Your Personal Data and the Legal Bases on Which We Rely*] above) or as long as required to (i) comply with a legal obligation, (ii) protect or defend our rights, interests or property or that of our employees, agents, members, customers and other third parties, (iii) prevent or investigate possible wrongdoing in connection with our products and services, (iv) enforce our terms and conditions, policies and agreements, (v) protect against legal liability or (vi) pursue legitimate interests or essential business purposes. We determine the appropriate retention period for Personal Data on the basis of the length of time we have an ongoing relationship with you (e.g., for as long as you have an account with us or keep using our products and services), the amount, nature, and sensitivity of the Personal Data being processed, the potential risk of harm from unauthorized use or disclosure of the Personal Data, whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal obligations (such as applicable statutes of limitation).

Please see Section 11 [*Your Rights Relating to Your Personal Data*] below to learn more about your right to request deletion of your Personal Data.

## 9. SECURITY RELATING TO PERSONAL DATA

We use appropriate technical and organizational measures to protect your Personal Data against accidental or unlawful destruction, loss, alteration, and unauthorized

disclosure or access. Such measures take into account the nature of the Personal Data and the processing and the threats posed.

While we endeavor to implement generally accepted security measures, no method of storage or transmission is 100% secure. In the event of a security incident, we will notify regulators and/or you as required by applicable laws and regulations. Such notice may come in the form of an email, postal mail, in-app notification or an electronic notice posted online or through our products and services.

## 10. AUTOMATED DECISION-MAKING

Currently, we do not make any decisions based solely on automated processing, including profiling, which produces legal effects ("**Automated Decision-Making**"). In the event our position changes, we will update this Policy and inform you as required by applicable data protection laws.

## 11. YOUR RIGHTS RELATING TO YOUR PERSONAL DATA

### 11.1 Your Rights

Depending on where you live, you may be able to exercise certain rights in relation to your Personal Data. These rights may include the right to:

- Obtain confirmation as to whether or not your Personal Data is being processed by us, and where that is the case, access to such Personal Data (and related details);
- Obtain rectification of inaccurate Personal Data and to have incomplete Personal Data completed;
- Obtain erasure or deletion of your Personal Data;
- Obtain restriction of our processing of your Personal Data or object to processing of your Personal Data;
- Receive your Personal Data in a structured, commonly used and machine-readable format and to transmit such data to another controller where feasible;

- Know about the existence of Automated Decision-Making and to not be subject to Automated Decision-Making;
- Withdraw your consent at any time, to the extent we rely on your consent as the legal basis for processing your Personal Data (without affecting the lawfulness of the processing based on such consent prior to your withdrawal or processing based on reliance on a legal basis other than consent);
- Lodge a complaint with the applicable supervisory authority; and
- Obtain additional information about the suitable safeguards and means we rely upon with regard to international transfer of Personal Data as described in Section 7 [*International Transfers of Personal Data*] above.

You will not be discriminated against for exercising any of your rights described in this Policy. Please note that these rights may be subject to further conditions, limitations and/or exemptions under applicable data protection laws. If any of the rights listed above are not provided under law for your jurisdiction, we have absolute discretion in providing you with these rights.

## 11.2 How to Exercise Your Rights

To exercise your applicable rights, please complete our [Privacy Webform](#) or contact us by using the information in Section 14 [*Contacting Us*] below.

To protect your privacy and maintain security, we may ask you to provide certain information to verify your identity and residence before granting you access to your Personal Data or complying with your request. We will contact you if we need additional information in order to process your request. If we are unable to verify your identity or rights to the data, we may not be able to provide you with data rights until you are able to provide us with proper documents. Where permitted by law, we reserve the right to charge an appropriate fee to cover administrative costs incurred in responding to your request, for instance, if your request is manifestly unfounded or excessive.

Under certain data protection laws, you may designate an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from

an agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need you to verify your identity directly with us.

**11.3 Your Rights Relating to WeWork Workplace Customer Data**

As described in Section 1 [*Introduction*] above, we may also process WeWork Workplace Customer Data that our customers and their Authorized Users submit or upload to the WeWork Workplace Platform. In these circumstances, if not stated otherwise in this Policy or in a separate disclosure, we process such WeWork Workplace Customer Data as a processor on behalf of our customer (and its affiliates) who is the controller of the WeWork Workplace Customer Data. We are not responsible for and have no control over the privacy and data security practices of our customers, which may differ from those explained in this Policy. If your data has been submitted to us in our role as a processor by or on behalf of a customer in connection with the WeWork Workplace Platform and you wish to exercise any rights you may have under applicable data protection laws, please contact the customer directly. Because we may only access WeWork Workplace Customer Data upon a customer’s instructions, if you wish to make your request directly to us, please provide us with the name of the customer who submitted your data to us. We will refer your request to that customer and will support them as needed in responding to your request within a reasonable timeframe.

**11.4 Your Preferences for Email, SMS, Push and In-App Marketing Communications and Membership Updates**

We want to make you aware of the fantastic products and services we offer! To do so, we may send you communications via email, text message, push notifications and in-app alerts. If we process your Personal Data for the purpose of sending you marketing communications, you can manage your preferences in a number of ways. To opt out of email marketing communications, you can use the unsubscribe function in any email you receive from us or contact us using the information in Section 14 [*Contacting Us*]. Opt-out requests can take up to ten (10) business days to be effective. To opt out of text messages, you can reply “STOP” to any SMS messages you receive from us. To control push notifications sent by our WeWork apps, you can change your notification settings on your device. To control WeWork in-app messages, you can change your



notification preferences in the WeWork apps' settings. Please note that opting out of marketing communications does not opt you out of receiving important business communications related to your current relationship with us, such as transactional communications about your memberships or event registrations, service messages, security alerts, invoices and updated terms and conditions.

We also want to make you aware of building and community updates, guest arrivals and deliveries as well as booking reminders and confirmations in connection with your membership. You can manage your notification preferences for these notifications in the settings located within the WeWork app or the web-based membership [platform](#). For more information on managing these notifications settings, please refer to the applicable section in our [Help Center](#). Please be sure to save any changes you make.

You can also contact us using the information in Section 14 [*Contacting Us*] below to assist with management of your preferences.

### **11.5 Your Preferences for Telemarketing Communications**

If you want your phone number to be added to our internal Do-Not-Call telemarketing register, please contact us by using the information in Section 14 [*Contacting Us*] below. Please include your first name, last name, company and the phone number you wish to add to our Do-Not-Call register.

Alternatively, you can always let us know during a telemarketing call that you do not want to be called again for marketing purposes.

### **11.6 Cookies, Targeted Online Advertising and Other Tracking Technologies**

For more information on how to manage the use of cookies, targeted online advertising and other tracking technologies, please refer to Section 7 [*How to Manage Cookies, Targeted Online Advertising and Other Tracking Technologies?*] in our [Cookie Policy](#).

### **11.7 Precise Location-Based Services**

With your consent, we may collect the approximate physical location of your device by using GPS, Bluetooth, cell phone tower locations, Wi-Fi signals and/or other

technologies to improve special offers and to enable location-based services. We collect this data if you opt in through the WeWork Apps or other program (either during your initial login or later). If you have opted in to share your location, the WeWork Apps or other program will be able to collect your location data based on how you chose to share the data. You can specify via your device's operating system (such as through the "Settings" icon) to always share location data, only when the App is in use or never. If you choose only when the App is in use, we will have access to the data until you log off or close the application or if you use your phone's or other device's settings to disable location capabilities for the WeWork App or other program.

### 11.8 Do Not Track

While some internet browsers offer a "do not track" or "DNT" option that lets you tell websites that you do not want to have your online activities tracked, these features are not yet uniform and there is no common standard adopted by industry groups, technology companies or regulators. Therefore, we currently do not participate in any "do not track" or "DNT" frameworks that would allow us to respond to signals or other mechanisms from you regarding the collection of your Personal Data.

## 12. CHILDREN AND PERSONAL DATA

Our products and services are not directed at children. We do not knowingly collect Personal Data from children under the age of 16, or such other applicable age of consent for privacy purposes in relevant individual jurisdictions, unless (a) we have obtained consent from a parent or guardian, (b) such collection is subject to a separate agreement with us or (c) the visit by a child is unsolicited or incidental. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us by using the information in Section 14 [*Contacting Us*] below, and we will take steps to delete their Personal Data from our systems.

## 13. CHANGES TO THIS POLICY

From time to time, we will update or modify this Policy, in our sole discretion, to reflect changes in legal and regulatory requirements and our business practices. The updated Policy will be posted to this website with a change to the "Last Updated" date (located

at the top of this Policy). We encourage you to review this page periodically to stay informed, especially before you provide Personal Data. In circumstances where we make updates or modifications to this Policy that materially alter your privacy rights, we will provide additional notice, such as via email or with in-service notifications, as required by law. The updated Policy will take effect immediately after being posted or as otherwise notified by us. Your continued relationship with us or your continued use of our website, products or services after any such updates take effect will constitute acknowledgement and (as applicable) acceptance of the updated Policy.

## 14. CONTACTING US

If you have questions or concerns relating to this Policy or privacy-related issues, please email us at [privacy@wework.com](mailto:privacy@wework.com) or send a letter to the address below. When you contact us, please indicate which country and/or state you reside. To exercise your applicable rights as described in Section 11 [*Your Rights Relating to Your Personal Data*], please complete our [Privacy Webform](#).

WeWork Privacy Team

12 East 49th Street

3rd Fl. Mail Room

New York, NY 10017 USA

WeWork complies with data protection laws requiring a local Data Protection Officer to be appointed. For more information, please email us at [privacy@wework.com](mailto:privacy@wework.com).

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, and you are located in the European Economic Area or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority. If you work or reside in a country that is a member of the European Union or that is in the EEA, you may find the contact details for your appropriate data protection authority on the European Data Protection Board's [website](#). If you work or reside in the United Kingdom, you may find the contact details for the Information Commissioner's Office (ICO) on the ICO's [website](#).

## 15. SEPARATE AND/OR SUPPLEMENTAL PRIVACY NOTICES AND POLICIES

Please see each section below for more information on our separate and/or supplemental privacy notices and policies that may govern how we process your Personal Data in certain circumstances.

### 15.1 U.S. Supplemental Privacy Notices

Certain U.S. state privacy laws (e.g., California and Virginia) may require specific disclosures for state residents. Please see our [U.S. Supplemental Privacy Notices page](#) to find additional state-specific privacy disclosures.

### 15.2 Applicant and Candidate Privacy Notice

For more information on how WeWork collects, uses, discloses, and otherwise processes Personal Data in connection with our application, recruitment and hiring process, please see our [Applicant and Candidate Privacy Notice](#).

### 15.3 Cookie Policy

For more information on how we use cookies, targeted online advertising and other tracking technologies, please see our [Cookie Policy](#).

### 15.4 COVID-19 Policy

For information on how WeWork collects, uses, discloses, and otherwise processes Personal Data in connection with our response to the COVID-19 pandemic, please see our [COVID-19 Privacy Notice](#).

### 15.5 Guest and Visitor Privacy Policy

For more information on how WeWork collects, uses, discloses, and otherwise processes Personal Data in connection with your access to our locations as a guest or

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visitor of a member or WeWork employee, please see our [Guest and Visitor Privacy Policy](#).

## 16. OTHER IMPORTANT PROVISIONS

### 16.1 Non-WeWork Group Companies

This Policy does not address, and we are not responsible for the privacy, data, or other practices of any entities other than the WeWork Group Companies (except as otherwise provided in this Policy), including Licensees, Add-On Partners, Sponsors, Landlords and Building Owners and Managers and Program Partners. In addition, we are not responsible for the privacy, data collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through our software and technology platform and applications or our social media pages.

### 16.2 Third-Party Links

Our website or products and services may contain links to other websites or services. If you click on a third-party link you will be directed to that third party's website or service. We do not exercise control over, nor do we assume responsibility for, any third-party websites or services or their privacy, data collection, use, disclosure or security policies or practices. In addition, these other websites may place their own cookies or other files on your computer, collect data or solicit Personal Data from you. We encourage you to read the privacy policies or statements of the other websites or services you visit. The fact that we link to a website or service is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices.

### 16.3 Anonymized Data

We use anonymized data. Anonymized data is data from which individuals cannot be identified or made identifiable neither by us nor anyone else. Anonymized data is not Personal Data and is not subject to data protection laws.

**16.4 WeWork Workplace Customer Data Used in Connection with the WeWork Workplace Platform**

We provide the WeWork Workplace technology platform and any related software, application, content or services (collectively, the “**WeWork Workplace Platform**”) to our customers under an agreement with them and solely for internal business purposes and for the benefit of their employees and other individuals authorized by them as users of the WeWork Workplace Platform (“**Authorized Users**”). As described in Section 1 [Introduction] above, this Policy does not apply to the content or information (“**WeWork Workplace Customer Data**”) that our customers and their Authorized Users submit or upload to the WeWork Workplace Platform. In those circumstances, (i) WeWork is processing WeWork Workplace Customer Data as a processor or service provider on behalf of our customer in accordance with the terms of the agreement with that customer and (ii) that customer is responsible for the collection and use of your data and that customer’s privacy policy will apply to the customer’s collection and use of such WeWork Workplace Customer Data. We are not responsible for the privacy or data security practices of our customers, which may differ from those explained in this Policy. You should refer to the customer’s privacy policy and direct any privacy or data security questions directly to them.



COMPANY

- Global Locations
- Mission
- Inclusion & Diversity
- Careers

PARTNERSHIPS

- Brokers
- Landlords
- Refer a Friend
- Event Planners

- Investors
- Newsroom
- Blog
- SUPPORT
- Contact Us
- Member Login
- Help Center
- COVID Response
- Strategic Reorganization

Language

English ▼

[All locations ▼](#)

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Floor 3  
New York, NY 10017

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